Loveland Parking and Terrain Improvement Project Environmental Assessment

Response to Comments

Introduction

A legal notice for the Loveland Parking and Terrain Improvement Project Environmental Assessment (EA) was published in the *Coloradoan* on September 10, 2020. The combined scoping and opportunity to comment period was open for 30 days. A notice of proposed action (NOPA) was mailed and/or emailed to approximately 92 interested individuals, government officials (including tribal contacts), public agencies, and other organizations. The NOPA was specifically designed to summarize the proposed action, elicit public comments during the 30-day combined scoping and opportunity to comment period, and provide instructions for public involvement and resources for additional information.

Additional information was available on the Arapaho and Roosevelt National Forests and Pawnee National Grassland (ARP) project website and comment submissions were accepted via this website. Comments were accepted via web submission.

A total of 5 comment letters were received. All comment letters were reviewed, and substantive comments and contact information for each commenter was entered into a master database. Substantive comments were extracted, and these substantive comments provide the foundation for which this Response to Comments document is based. Comments raised by the public were categorized into the following resource topics: watersheds and wetlands.

Names and affiliations of people who submitted comments during the combined scoping and opportunity to comment period are provided here:

Noelle Beegle

Kate Bober, Bear Paw Stanbro Property Management, Inc.

Carolyn Gleason, Environmental Protection Agency Region 8

Mary Millard

Suzen Raymond, ATV Tours Colorado

Response to Comments

1.0 Watersheds

1.1 The EPA recommends discussing the following aquatic resource impacts, including which waters may be impacted, the nature of these impacts, and the specific pollutants that they deal with:

(1) Sedimentation and Water Quality: Potential impacts to water quality and quantity from runoff associated with surface disturbance during the construction and operation of the proposed facilities. This runoff would include sheetwash and channelized snowmelt from the Project catchment area into the Clear Creek Watershed. Specifically, we recommend assessing the potential for runoff to modify sediment loads and introduce salts, refuse, heavy metals, hydrocarbons, automotive chemicals or other pollutants into Clear Creek.

Refer to *Section 3.2* of the EA and the Hydrology Report for a discussion of the potential impacts of the proposed projects on water quality and quantity of the study watersheds.

(2) Parking Lot Snow Management: Potential impacts to water quality in Clear Creek stemming from pollutant accumulation in plowed snow storage in the Project area, especially around its parking lots. Clear Creek flows so near the proposed and existing parking areas that on-site snow storage practices may directly influence its water quality during seasonal melting events.

Refer to *Section 3.2* of the EA and the Hydrology Report for a discussion of the potential impacts of the proposed projects on water quality and quantity of the study watersheds. In addition, *Table 2-1* of the EA includes PDC for snow storage management and a requirement to submit a plan for Forest Service approval that minimizes impacts from pollutants to Clear Creek.

(3) Drinking Water: Potential impacts to drinking water from the Project including source water protection areas and other municipal or private water supplies.

Refer to *Section 3.2* of the EA and the Hydrology Report for a discussion of the potential impacts of the proposed projects on drinking water.

(4) Snowmaking: Potential impacts to water quality and quantity from any additional snowmaking potentially associated with the proposed ski trails and terrain improvements over the life of these structures. This analysis is recommended to include a detailed description and water quality analysis of any snowmaking source waters, a map of existing and proposed snowmaking coverage, and a statement of need for any potential expansion of snowmaking activities in the Project Area.

Refer to *Section 3.2* of the EA and the Hydrology Report for a discussion of water quantity in the study watersheds and the existing snowmaking coverage in the project area. As stated in *Chapter 2*, existing snowmaking coverage on Zig Zag would be expanded to accommodate increased trail widths associated with the proposed terrain improvements. The amount of snow required to cover these areas would be comparable

to existing conditions, as the trail surface would be improved, and less snow would be needed to flatten uneven grades. There are no snowmaking infrastructure projects associated with the proposed action. Furthermore, refer to the 2017 Loveland Ski Area Master Development Plan for a map of existing snowmaking coverage.

1.2 The EPA recommends the NEPA analysis identify and discuss how surface water quality will be protected or impacted by Project activities. To this end, the EPA recommends the NEPA analysis include:

(1) A list of Best Management Practices (BMPs) that will be required to protect surface water resources;

Refer to Table 2-1 of the EA for a list of PDC required as part of the proposed action.

(2) A discussion of the circumstances under which the BMPs would be applied (e.g., proximity to surface water resources, presence of erosive soils, slope, adequate drainage, etc.);

The PDC identified in **Table 2-1** of the EA describe parameters under which they would be implemented.

(3) A description of snow management protocols for the Project's parking lot expansions detailing the location(s) where removed snow would be stored. We recommend including snow management specific BMPs and stormwater retention structures around the parking area in order to prevent refuse, sediment, salt and automotive pollutants from entering Clear Creek. An assessment of the water source/use relationships associated with any potential increases to seasonal snowmaking and detailed description of associated BMPs; and

Refer to *Table 2-1* of the EA for PDC that address snow storage management. This includes the development of a snow management plan to prevent wetland disturbance and disruption to the BLT/CDNST and Clear Creek.

(4) An explanation of how the USFS would ensure that BMPs would be monitored to ensure timely and correct implementation as well as timely maintenance.

Monitoring, where appropriate and necessary, is identified in specific PDC and the preface to *Table 2-1* in *Chapter 2*.

2.0 Wetlands

2.1 We recommend that USFS analyze potential impacts from all potential Project alternatives to the following: • Total wetland area and function; • Wetland vegetation, riparian habitats, and aquatic biota; and, • Wetland erosion or aggradation from runoff channelization or redirection.

A detailed analysis of the anticipated impacts to wetlands in and adjacent to the project area is included in the Wetlands Specialist Report, which is available for review on the project webpage and summarized in **Section 3.3** of the EA.

2.2 We also recommend that the NEPA analysis evaluate methods to protect surrounding wetlands and riparian areas including the following:

(1) Specific mitigation requirements and BMPs applicable for construction, maintenance and reclamation activities to prevent adverse impacts to aquatic resources in the Project area. These could include initiatives prioritizing development away from steep slopes, erosive soils, road crossings, and alpine streams, seeps, and meadows. Other control measures could include the use of silt fences, detention ponds, waste collection grates, or off road/trail culverts; and

Table 2-1 of the EA identifies PDC that would be a requirement of authorizing the proposed action. These PDC include measures to avoid and minimize wetland impacts. Prior to the initiation of the NEPA process, the ARP and Loveland collaborated on the parking lot design and trail layout to reduce wetland impacts. Prior versions of the parking lot design are included in the project file on the project webpage.

(2) A map of seeps, springs, and wetland areas delineating these resources before development in order to facilitate their protection and support any necessary US Army Corps of Engineers permits.

A map of existing seeps, springs, and wetland areas in and adjacent to the project area is included in the Wetlands Specialist Report, which is available for review on the project webpage and summarized in **Section 3.3** of the EA.

2.3 Dust suppression from disturbed areas is an important mitigation consideration in many areas of the West. Given the proximity of the project to major transportation corridors and active air quality monitoring stations, the EPA recommends the NEPA analysis include a plan for addressing dust control during construction. We suggest the plan include the level of required or anticipated dust control, control methods, documentation procedures, and accountability processes. The EPA recommends reducing surface disturbance to effectively reduce fugitive dust. Impacts can also be reduced by reclaiming disturbed areas as soon as practicable.

Dust abatement would be included in the standard BMPs that Loveland would be required to incorporate into its Construction Implementation Plan for the proposed action.

2.4 We recommend that the BLM include a section in the NEPA analysis that details the mitigation and control measures that will be implemented for the Project and what entity will be executing any mitigation. A list of all necessary permits for construction, transportation, water, air, or land use in the Project vicinity may also clarify implementation and mitigation plans in the Draft EA. A detailed disclosure of Project funding sources is also recommended for inclusion in the interest of public understanding as are surface water quality monitoring efforts in the Project area following construction and additional snowmaking. Such monitoring efforts would identify any potential resource improvements or mitigation needs developed through Project implementation.

Table 2-1 of the EA identifies the required PDC that are included in the proposed action and assigns entities with responsibility for implementation, as deemed necessary by the Forest Service. This may

include responsibilities for monitoring activities. A list of necessary permits is included in **Chapter 1** of the EA. Loveland will fund all projects included in the proposed action.